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ADMITTED TO PRACTICE

New York State Eastern District of New York Southern District of New York

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September 15, 2022

Via: ECF

Honorable Ronnie Abrams United States District Judge Southern District of New York 40 Foley Square New York, New York 10007 Application granted.

SO ORDERED.

Ronnie Abrams, U.S.D.J. September 16, 2022

Re: United States v. Djonibek Rahmankulov, 20 Cr. 653 (RA) Defendant's request to extend deadline to file post-trial motions due to client being held in quarantine.

Dear Judge Abrams:

I write to respectfully request an extension of the deadline for me to file Defendant's post-trial motions for two weeks to September 29, 2022, for the following reasons.

The trial in the above referenced matter commenced on August 22, 2022, with jury selection and was concluded with the jury's guilty verdicts and my client's bail being revoked and remanded by order of this Court on September 1, 2022 (see dkt. No. 175). My client is currently being held in the custody of the Bureau of Prisons at the Metropolitan Detention Center in Brooklyn ("MDC"). On September 7, 2022, I attempted to engage in an attorney visit with my client, in person, at MDC, but was denied access due to my client being held in Covid-19 quarantine. I was advised that quarantine it could last anywhere from 10 days to two weeks.

My client has only been able to contact me via recorded telephone communication. As of earlier this morning, my client was advised that he may be transferred out of quarantine later today. Accordingly, I respectfully request an extension of the deadlines for Defendant to file post-trial motions for two weeks to September 29, 2022. I have conferred with counsel for the Government and they have no objection to this request.

Respectfully,

Joseph W. Murray, Esq.

Cc: to all parties via ECF